

1 Harry Stuart Kinder
11720 Puerto Banus Ave
2 Las Vegas, NV 89138
Tel: 415-717-2471
3 Email: barrister999@yahoo.com
Plaintiff *Pro Se*

4
5 NICHOLAS J. BOOS, Nevada Bar No. 16047
nboos@maynardnexsen.com
MAYNARD NEXSEN LLP
6 Two Embarcadero Center, Suite 1450
San Francisco, California 94111
7 Telephone: (415) 646-4700
Facsimile: (205) 254-1999

8 Attorneys for Defendants
9 LM INSURANCE CORPORATION and LIBERTY MUTUAL
INSURANCE COMPANY

10 Designation for Service Only:
11 Kristol Bradley Ginapp, Nevada Bar No. 8468
Holley Driggs
12 300 S. 4th Street, Suite 1600
Las Vegas, Nevada 89101
13 kginapp@nevadafirm.com

14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 HARRY STUART KINDER,

18 Plaintiff,

19 v.

20 LM INSURANCE CORPORATION,
21 LIBERTY MUTUAL INSURANCE
COMPANY, and Does 1 through 100,

22 Defendants.

Case No. 2:23-cv-01338-JAD-BNW

**JOINT MOTION TO EXTEND TIME
TO FILE OPPOSITION TO MOTION
TO COMPEL**

(SECOND REQUEST)

Motion Filed: July 15, 2024

23 Pursuant to Local Rules IA 6-1, IA 6-2, and Local Rule 7-1, Defendants LM Insurance
24 Corporation and Liberty Mutual Insurance Company (“Defendants”) and Plaintiff Harry Stuart
25 Kinder (“Plaintiff”) (collectively, Defendants and Plaintiff are referred to as “the Parties”), jointly
26 move the Court for an order extending the deadline for Defendants to file an opposition to
27 Plaintiff’s Motion to Compel filed on July 15, 2024. Docket No. 27 (“the Motion”). The Court
28 previously extended the deadline 14 days, resulting in a new opposition deadline of August 12,

1 2024. The Parties seek a further extension of 7 days, with a new resulting deadline of August 19,
2 2024. This is the second motion to extend the deadline at issue. The Parties respectfully submit
3 that good cause exists to extend this deadline due to their continued meet and confer efforts which
4 may narrow the discovery issues that the Court will need to adjudicate. In support of their request,
5 the Parties state as follows:

6 Plaintiff filed the Motion on July 15, 2024. Docket No. 27. The Parties have met and
7 conferred multiple times related to certain issues raised in the Motion and are continuing to meet
8 and confer in an attempt to resolve further issues. Specifically, since the pendency of the Motion,
9 Defendants have produced additional documents. This may resolve an issue raised in the motion.
10 Additionally, Defendants have agreed to produce the maintained underwriting file for the policy
11 at issue and portions of its claim handling guidelines applicable to homeowners' policy property
12 loss claims upon the entry of a protective order. The Parties are meeting and conferring regarding
13 entering into a stipulated protective order.

14 The Parties submit that the possibility of resolution of some issues in the Motion which
15 may occur should the extension be granted also constitutes good cause. Though the Parties are
16 seeking additional time, the 7 days now requested would allow the Parties continue to meet and
17 confer. The resulting new deadline would be August 19, 2024. The Parties do not request an
18 extension of any other deadline through this motion.

19
20 Dated: Aug 9, 2024

21
22 By: /s/ Harry Stuart Kander

Harry Stuart Kander
Plaintiff Pro Se

1 Dated: 8/9/2024

MAYNARD NEXSEN LLP



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3 By: NICHOLAS J. BOOS
4 Attorneys for Defendants
5 LM INSURANCE CORPORATION and
6 LIBERTY MUTUAL INSURANCE
7 COMPANY

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9 IT IS SO ORDERED:

10 
11 UNITED STATES MAGISTRATE JUDGE

12 DATED: August 12, 2024